

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.

CHUKWUMA E. AZUBUKO,  
Plaintiff,

v.

FOUR UNKNOWN BOSTON POLICE  
OFFICERS & THREE UNKNOWN  
ASSISTANT DISCTRICT ATTORNEYS,  
Defendants.

**NOTICE OF REMOVAL**  
**(PURSUANT TO 28 U.S.C. § 1441)**

The Defendants, four unknown Boston Police Officers, through undersigned counsel, hereby gives notice of the removal of this action pursuant to 28 U.S.C. §§ 1441 and 1446 from the Boston Municipal Court, Roxbury Division, where this action is currently pending. In Boston Municipal Court, the case is docketed as Civil Action No. 1602-CV-158 and has the same caption as above.

In support of this Notice of Removal, the Defendants state as follows:

1. This action, brought pursuant to 42 U.S.C. § 1983, alleges *inter alia* that four unknown City of Boston Police Officers, violated Plaintiff's civil rights under the United States Constitution. Specifically, the Plaintiff alleges that the four City of Boston Police officers are liable for false arrest, false imprisonment, and malicious / false prosecution. See Plaintiff's Summons and Complaint, attached hereto as Exhibit 1.

2. This Court has jurisdiction over the Plaintiff's federal claims pursuant to 28 U.S.C. § 1331, and the entire action may be removed pursuant to 28 U.S.C. § 1441(c).

3. A fair reading of the facts and theories as a whole makes it apparent that federal constitutional law and issues are essential to this case and therefore the Defendants have a statutory right to remove this action.

4. Defendants' Notice of Removal has been filed within thirty (30) days from service of the Plaintiff's complaint upon them on April 19, 2016. See Date Stamped Certified Envelope, attached hereto as Exhibit 2.

Respectfully submitted,  
DEFENDANTS, FOUR UNKNOWN  
BOSTON POLICE OFFICERS,  
By their attorney,  
Eugene L. O'Flaherty  
Corporation Counsel

/s/ Jacob Goodelman  
Jacob Goodelman (BBO# 693356)  
Assistant Corporation Counsel  
City of Boston Law Department  
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Boston, MA 02201  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon each party appearing pro se and the attorney of record for each other party via first class mail.

April 26, 2016  
Date

/s/ Jacob Goodelman  
Jacob Goodelman